

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                          |   |             |
|--------------------------|---|-------------|
| UNITED STATES OF AMERICA | ) |             |
|                          | ) |             |
| V.                       | ) | 12 CR 172-2 |
|                          | ) |             |
| Chadia Abueid,           | ) |             |
| Defendant                | ) |             |

AGREED MOTION TO MODIFY CONDITIONS OF BOND TO ALLOW TRAVEL TO BRAZIL

Now comes Chadia Abueid by her attorney Robert G. Clarke, requesting this court for an order allowing her to travel to Brazil from March 14, 2016 to March 28, 2016 and in support thereof states:

1. That Ms. Abueid was placed on three year probation on November 25, 2014,(Docs. 111,112) by this court in a state and municipal tax evasion case stemming from the sale of unstamped cigarettes;
2. She has not incurred any violations of probation;
3. She is gainfully employed by a food distribution service, earning minimal amounts;
4. She now petitions to travel to Brazil to visit with family members regarding family matters;
5. Ms. Abueid grew up in Brazil before moving to Palestine;
6. Ms. Abueid was permitted to travel to Palestine before pleading guilty in 2014 by this court;
7. Ms. Abueid has submitted her itinerary to the Probation department which (Ms. Lisa Palmer) has no objection to her travelling to Brazil;

8. The prosecutor, Mr. Sunil R. Harjani, has no objection to this travel request.
9. That the plane tickets for Ms. Abueid (and her hotel accommodations) were generously purchased by her older brother Mr. Paulo Maali.

Wherefore Defendant prays that she be permitted to travel to Brazil.

Respectfully Submitted,

s/Robert G. Clarke, Attorney

PROOF OF SERVICE AND NOTICE OF FILING

Counsel for petitioner, Robert G. Clarke, hereby states that he has filed this motion to allow Petitioner Chadia Abueid to travel to Brazil with her family this 8<sup>th</sup> day of March, 2016 on the CM/ECF system which filing will send notification of such filing to other CM/ECF participants.

s/Robert G. Clarke, Attorney